United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 [N] 2 [5]	3 [DE0000229] 11	12 [091014] 17	18 [S]	19 [S]	20 [2]

Remarks

21 [ ] 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 [010] 69	70 [3]	71 [F]	72 [N]	73 [ ] 74 75 [ ] 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

ALLEN FAMILY FOODS
P.O. BOX 63
HARBESON DE 19951

Entry Time/Date: 08:45 AM 10-14-09

Permit Effective Date: 5-1-06

Exit Time/Date: 2:10 PM 10-14-09

Permit Expiration Date: 4-30-11

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

MIKE SAUSE (ORC / MGR)
(302) 684-1640

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

Name, Address of Responsible Official/Title/Phone and Fax Number

JOHN EVANS (PLT MGR)
(302) 684-1640 (EXT # 126)

Contacted: ☐ Yes ☑ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

[X] Permit	[ ] Self-Monitoring Program	[X] Pretreatment	[ ] MS4
[X] **Records/Reports**	[ ] Compliance Schedules	[ ] Pollution Prevention	
[X] Facility Site Review	[X] Laboratory	[X] Storm Water	
[X] Effluent/Receiving Waters	[X] Operations & Maintenance	[ ] Combined Sewer Overflow	
[X] Flow Measurement	[X] Sludge Handling/Disposal	[ ] Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes	SEV Description
☐☐☐☐☐	
☐☐☐☐☐	
☐☐☐☐☐	
☐☐☐☐☐	

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Owen V. McCarthy	DNREC (302) 739-9946	10-14-09
Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
	DNREC (302) 739-9946	11-17-09

Form Approved
OMB No. 158-R0073

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable	PERMIT NO. DE 0000299

SECTION F - Facility and Permit Background

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY *(Including City, County and ZIP code)*	DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE: 12-8-08 FINDINGS

SECTION G - Records and Reports

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☑ YES ☐ NO ☐ N/A *(Further explanation attached _____)*
DETAILS:

(a) ADEQUATE RECORDS MAINTAINED OF:				
(i)	SAMPLING DATE, TIME, EXACT LOCATION & PERSON	☑ YES	☐ NO	☐ N/A
(ii)	ANALYSES DATES, TIMES	☑ YES	☐ NO	☐ N/A
(iii)	INDIVIDUAL PERFORMING ANALYSIS	☑ YES	☐ NO	☐ N/A
(iv)	ANALYTICAL METHODS/TECHNIQUES USED	☑ YES	☐ NO	☐ N/A
(v)	ANALYTICAL RESULTS *(e.g., consistent with self-monitoring report data)*	☑ YES	☐ NO	☐ N/A
(b) MONITORING RECORDS *(e.g., flow, pH, D.O., etc.)* MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS *(e.g. continuous monitoring instrumentation, calibration and maintenance records)*.		☑ YES	☐ NO	☐ N/A
(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.		☑ YES	☐ NO	☐ N/A
(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.		☑ YES	☐ NO	☐ N/A
(e) QUALITY ASSURANCE RECORDS KEPT.		☑ YES	☐ NO	☐ N/A
(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES *(and their compliance status)* USING PUBLICLY OWNED TREATMENT WORKS.		☐ YES	☐ NO	☑ N/A

SECTION H - Permit Verification

INSPECTION OBSERVATIONS VERIFY THE PERMIT. ☑ YES ☐ NO ☐ N/A *(Further explanation attached _____)*
DETAILS:

(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.	☑ YES	☐ NO	☐ N/A
(b) FACILITY IS AS DESCRIBED IN PERMIT.	☑ YES	☐ NO	☐ N/A
(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.	☑ YES	☐ NO	☐ N/A
(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.	☑ YES	☐ NO	☐ N/A
(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.	☐ YES	☐ NO	☑ N/A
(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED.	☑ YES	☐ NO	☐ N/A
(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.	☑ YES	☐ NO	☐ N/A
(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS. BEAVER DAM CREEK	☑ YES	☐ NO	☐ N/A
(i) ALL DISCHARGES ARE PERMITTED.	☑ YES	☐ NO	☐ N/A

SECTION I - Operation and Maintenance

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☑ YES ☐ NO ☐ N/A *(Further explanation attached _____)*
DETAILS:

(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED. No Power / No Flow	☑ YES	☐ NO	☐ N/A
(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☑ YES	☐ NO	☐ N/A
(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.	☐ YES	☐ NO	☑ N/A
(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED. - CDI -	☑ YES	☐ NO	☐ N/A
(e) ALL TREATMENT UNITS IN SERVICE.	☑ YES	☐ NO	☐ N/A
(f) CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS. JOHN REED ENG,	☑ YES	☐ NO	☐ N/A
(g) QUALIFIED OPERATING STAFF PROVIDED. SEE 4.04	☑ YES	☐ NO	☐ N/A
(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS. DST - DTCC	☑ YES	☐ NO	☐ N/A
(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.	☑ YES	☐ NO	☐ N/A
(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.	☑ YES	☐ NO	☐ N/A
(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED.	☑ YES	☐ NO	☐ N/A
(l) SPCC PLAN AVAILABLE. 2-10-09	☑ YES	☐ NO	☐ N/A
(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. *(Dates _____ _____)*	☐ YES	☐ NO	☑ N/A
(n) ANY BY-PASSING SINCE LAST INSPECTION.	☐ YES	☑ NO	☐ N/A
(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.	☐ YES	☑ NO	☐ N/A

Form Approved
OMB No. 158-R0073

PERMIT NO. DE 0000299

SECTION J - Compliance Schedules

PERMITTEE IS MEETING COMPLIANCE SCHEDULE. ☐ YES ☐ NO ☑ N/A *(Further explanation attached _____)*

CHECK APPROPRIATE PHASE(S):

- ☐ (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- ☐ (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING *(mortgage commitments, grants, etc.)*.
- ☐ (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- ☐ (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- ☐ (e) CONSTRUCTION HAS COMMENCED.
- ☐ (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- ☐ (g) CONSTRUCTION HAS BEEN COMPLETED.
- ☐ (h) START-UP HAS COMMENCED.
- ☐ (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

SECTION K - Self-Monitoring Program

Part 1 -- Flow measurement *(Further explanation attached _____)*

PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	☑ YES	☐ NO	☐ N/A
(a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED.	☑ YES	☐ NO	☐ N/A
TYPE OF DEVICE: ☐ WEIR ☑ PARSHALL FLUME ☐ MAGMETER ☐ VENTURI METER ☐ OTHER *(Specify _____)*			
(b) CALIBRATION FREQUENCY ADEQUATE. *(Date of last calibration 3-11-09)*	☑ YES	☐ NO	☐ N/A
(c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.	☑ YES	☐ NO	☐ N/A
(d) SECONDARY INSTRUMENTS *(totalizers, recorders, etc.)* PROPERLY OPERATED AND MAINTAINED.	☑ YES	☐ NO	☐ N/A
(e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES.	☑ YES	☐ NO	☐ N/A

Part 2 -- Sampling *(Further explanation attached _____)*

PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	☑ YES	☐ NO	☐ N/A
(a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☑ YES	☐ NO	☐ N/A
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.	☑ YES	☐ NO	☐ N/A
(c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT. IF NO, ☐ GRAB ☐ MANUAL COMPOSITE ☑ AUTOMATIC COMPOSITE FREQUENCY 24 HRS.	☑ YES	☐ NO	☐ N/A
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.	☑ YES	☐ NO	☐ N/A
(i) SAMPLES REFRIGERATED DURING COMPOSITING	☐ YES	☑ NO	☐ N/A
(ii) PROPER PRESERVATION TECHNIQUES USED No ICE = 10°C	☐ YES	☑ NO	☐ N/A
(iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT	☑ YES	☐ NO	☐ N/A
(iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3	☑ YES	☐ NO	☐ N/A
(e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT.	☐ YES	☑ NO	☐ N/A
(f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.	☐ YES	☐ NO	☑ N/A

Part 3 -- Laboratory *(Further explanation attached _____)*

PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	☑ YES	☐ NO	☐ N/A
(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. *(40 CFR 136.3)*	☑ YES	☐ NO	☐ N/A
(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED.	☐ YES	☐ NO	☑ N/A
(c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED.	☐ YES	☑ NO	☐ N/A
(d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.	☑ YES	☐ NO	☐ N/A
(e) QUALITY CONTROL PROCEDURES USED.	☑ YES	☐ NO	☐ N/A
(f) DUPLICATE SAMPLES ARE ANALYZED. 25 % OF TIME.	☑ YES	☐ NO	☐ N/A
(g) SPIKED SAMPLES ARE USED. 100 % OF TIME.	☑ YES	☐ NO	☐ N/A
(h) COMMERCIAL LABORATORY USED.	☑ YES	☐ NO	☐ N/A
(i) COMMERCIAL LABORATORY STATE CERTIFIED.	☐ YES	☐ NO	☑ N/A

LAB NAME Enviroscan Labs

LAB ADDRESS Harrington De.

Form Approved
OMB No. 158-R0073

PERMIT NO. DE 0000299

SECTION L - Effluent/Receiving Water Observations *(Further explanation attached ____)*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER
001	No	No	No	No	No	CLEAR	—

(Sections M and N: Complete as appropriate for sampling inspections)

SECTION M - Sampling Inspection Procedures and Observations *(Further explanation attached ____)*

- ☑ GRAB SAMPLES OBTAINED
- ☑ COMPOSITE OBTAINED
- ☑ FLOW PROPORTIONED SAMPLE
- ☑ AUTOMATIC SAMPLER USED
- ☑ SAMPLE SPLIT WITH PERMITTEE
- ☑ CHAIN OF CUSTODY EMPLOYED
- ☑ SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

COMPOSITING FREQUENCY 24 hr. PRESERVATION * Iced

SAMPLE REFRIGERATED DURING COMPOSITING: ☐ YES ☑ NO

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE industrial

SECTION N - Analytical Results *(Attach report if necessary)*

* Composit sample obtained on 10/15/09
(See attached letter)

Amc

WATER COMPLIANCE INSPECTION REPORT
STORM WATER EVALUATION
National Pollutant Discharge Elimination System Permitting Program
Delaware Department of Natural Resources and Environmental Control
Surface Water Discharges Section

Name and location of Facility Inspected	Entry Time/Date	Permit Effective Date:
Allen Family Foods Harbeson DE	08:45 10-14-09	5-1-06
	Exit Time/Date: 10-14-09	Permit Expiration Date: 4-30-11

An evaluation of the facility's storm water management program was completed in order to determine whether or not the facility is operating in compliance with regards to the storm water permitting requirements of their NPDES permit. The evaluation consisted of a records review and a visual observation of the facility's storm water management system.

The facility is permitted to discharge storm water from Outfall(s) _____.

RECORDS REVIEW		Yes	No	S/C
1)	**Storm Water Plan.** Has the facility developed and implemented a Storm Water Plan as required by Part III of their NPDES Permit? What is the date of the current SWP?	X		
2)	**Training.** Training completed annually? Are all employees and contractor personnel that work in areas where industrial materials are used/stored trained to meet the requirements of the SWP?	X		
3)	**Inspection Records.** Are storm water inspections conducted and documented? Please describe.	X		
4)	**Monitoring Data.** Has the facility performed storm water monitoring as required by the permit?		X	
5)	**Spill and Leaks.** Have any major spills or leaks occurred resulting in a discharge to the storm water conveyance system? Is the facility maintaining records indicating spills/leaks?		X	

PHYSICAL INSPECTION		Yes	No	S/C
1)	**Storm Water Outfalls.** Are storm water outfalls identified as required? Outfalls free of trash/ debris/erosion? Any non-storm water discharges occurring?	X		
2)	**Storm Water Conveyance System.** Are catch basins, storm water conveyance systems and storm water treatment facilities cleaned at appropriate intervals? Is the storm water conveyance system free of trash and debris?	X		
3)	**Good Housekeeping Practices.** Are outside areas kept neat and clean? Is process debris removed regularly? Is there evidence of leaks/spills? Is there evidence of particulate matter or visible deposits and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the storm water discharge?	X		
4)	**Storm Water Pollution: materials being stored in a manner that minimizes their exposure to storm water?**	X		
5)	**Storm Water Visual Observations:** Are the following present in storm water discharges or do the outfalls indicate evidence thereof?			

OUTFALL NUMBER	OIL SHEEN	VISIBLE FOAM	VISIBLE FLOATING SOLIDS	COLOR
002, 003, 004	No	No	No	—

COMMENTS

Storm Water Outfalls clean and identified !

Compliance Status At Time of Inspection: In Compliance

Reconnaissance Inspection Required: Yes or No **If Yes, an Inspection shall be completed within ___ months.**

Inspector's Printed Name: Allen McCloskey

Inspector's Signature: Allen V. McCloskey **Date:** 10-14-09

SIGMA SAMPLER ALIQUOT VERIFICATION

1-30-08	3 samples taken	100 ml each	Tom Paine / Chris Brinson
4-17-08	3 samples taken	100 ml each	Tom Paine / Chris Brinson
5-23-08	3 samples taken	100 ml each	Tom Paine / Chris Brinson
8-5-08	3 samples taken	100 ml each	Tom Paine / Robert Salensky
10-7-08	3 samples taken	100 ml each	Tom Paine
11-18-08	3 samples taken	100 ml each	Tom Paine
12-02-08	3 samples taken	100 ml each	Tom Paine
4-4-09	3 samples taken	100 ml each	Tom Paine
5-10-09	3 samples taken	100 ml each	Tom Paine
8-31-09	3 samples taken	100 ml each	Tom Paine
9-30-09	3 samples taken	100 ml each	Tom Paine

English

Statement of Accuracy

Calibration Cert #3448.01

FRIO-Temp® Thermometer

Serial Number: L66715 Date of Rep SEP 11 2008

This is to confirm the thermometer bearing the serial number above was compared with standards traceable to the National Institute of Standards and Technology (NIST) and Deutscher Kalibrierdienst (DKD/PTB). Accuracy for this thermometer is ±1 scale division from -50 to +130°C and ±2 scale divisions for temperatures below -50°C and above +130°C.

The Standard Serial Number is based on the range of the thermometer. The Standard Serial Numbers calibrated by NIST and DKD/PTB are as follows:

#7713700 (NIST), #728 (DKD/PTB) for ranges below -30°C
#844016 (NIST), #730 (DKD/PTB) for ranges from -30°C to 10°C
#878708 (NIST), #733 (DKD/PTB) for ranges from 0°C to 50°C
#9810984(NIST), #735 (DKD/PTB) for ranges from 50°C to 100°C
#905354 (NIST), #736 (DKD/PTB) for ranges from 100°C to 150°C
#878735 (NIST), #739 (DKD/PTB) for ranges from 150°C to 200°C

H-B Instrument Company's laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005 through A2LA. H-B's laboratory also meets the requirements of ANSI/NCSL Z540-1-1994.

The expanded measurement uncertainties associated with our calibration system are ±0.075°C from -80 to -1°C, ±0.064°C at the ice point in melting ice bath, ±0.066°C from 1 to 100°C, ±0.066°C from 101 to 200°C, ±0.066°C from 201 to 300°C, and ±0.064°C from 301 to 400°C. These uncertainties have been calculated using our Work Instruction WI-19 to 22 that utilizes methods found in NIST Technical Note 1297. The reported uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of k=2.

Richard Jackson, Production Manager
H-B Instrument Company

ISO 9001:2000 Registered

Instructions for reuniting separated fluid in thermometers

Store thermometers in an upright position to prevent liquid separation

Handle instruments with care. Wear safety glasses and gloves before proceeding

Cooling Method

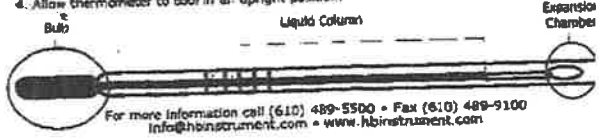
1. Prepare a solution of shaved ice and salt OR CO_2 (Dry Ice) and alcohol.
2. Place the thermometer bulb in the solution, keeping the thermometer upright.
3. Allow the liquid column to retreat into the bulb.
4. Swing the thermometer (bulb down) in an arc, forcing the entrapped gas to rise above the column.
5. Allow the thermometer to warm slowly in an upright position

Heating Method

1. Heat the thermometer bulb in an upright position in warm liquid, warm air or over a soft flame.
2. Allow the liquid column to rise until the separated portion of the column enters the expansion chamber at the top of the thermometer.
   NOTE: over-filling the expansion chamber will break the thermometer
3. Tap the thermometer gently in an upright position, allowing the gas separating the column to rise above the column.
4. Allow the thermometer to cool slowly in an upright position.

For Low Temperature Bottle Thermometers (-90°C to 35°C)

1. Hold the thermometer upright, bulb down.
2. For mercury thermometers, tap the bulb onto a rubber stopper or other soft surface until the mercury comes to the bottom of the expansion chamber. Apply minimal heat (the warmth of your hand should do). Force the remaining mercury column up to meet the separated liquid without filling the expansion chamber more than half way.
3. For non-mercury thermometers, heat the bulb with a soft flame or warm air until the liquid comes to the bottom of the expansion chamber. Allow the remaining liquid column to reunite by catching the separated liquid before the expansion chamber becomes half full
4. Allow thermometer to cool in an upright position.



For more information call (610) 489-5500 • Fax (610) 489-9100
info@hbinstrument.com • www.hbinstrument.com

HORNEY INDUSTRIAL ELECTRONICS

Process Control Technology

CERTIFICATE OF CALIBRATION

Date : August 11, 2009

Allen Family Foods
Rt 5 P.O. Box 63
Harbeson DE 19951

Purchase Order: 4500055151 Job: 604555

Manfg.	Serial#	Range
Oakton pH510 Series	283911	0-14 pH
E&H FMU 861	XSR0070EP03	0-1200 GPM
H/W Trueline DR45AT	9850Y839479500002	Pen 1 – 0-1200 GPM Pen 2 – 0-14 pH
Signet 3-8750-1P	60412162940	0-14 pH

FMU861 Z = 3.005
pH 4 = USA Blue S#40465 Lot 8AA002
pH 7 = USA Blue S#40475 Lot 8AA121
pH 10 = USA Blue S#40477 Lot 7AL214

ALL CALIBRATION TRACEABLE TO N.I.S.T. AS PER MANFG. SPECIFICATION

P. O. BOX 700 • BRIDGEVILLE, DELAWARE 19933 • 302-337-3600 • FAX 302-337-8560

ENVIROCORP LABS
51 Clark St. Harrington, DE 19952
PH: 302.398.4313 FX: 302.398.4312
ANALYTICAL SERVICES: NPDES, RCRA, GROUND WATER MONITORING

ANALYTICAL RESULTS

Allens Foods - Harbeson
P.O. Box 63
Harbeson, DE 19951

Attention: Michael Sause

Lab ID:	077364	Matrix:	Soil/Sludge	Sample Start:	9/30/09 9:15
Description:		Site:	Sludge	SampleEnd:	
Type:	Grab			Date Received:	9/30/09 15:05

Parameters	Units	Results	Analyzed	By	Method
Metals					
Cadmium	mg/kg	<0.50	10/7/09 16:22	HJG3	EPA 200.9
Copper	mg/kg	107	10/7/09 16:22	HJG3	SM3111-B
Lead	mg/kg	3.9	10/7/09 16:22	HJG3	EPA 200.9
Mercury	mg/kg	<1.3	10/6/09 9:44	ALSI	245.5
Metals Digestion for AA		Completed	10/12/09 16:46	HJG	EPA 200.2
Molybdenum	mg/kg	3.5	10/7/09 16:22	HJG3	EPA 200.9
Nickel	mg/kg	14	10/7/09 16:22	HJG3	EPA 200.9
Potassium	mg/kg	3220	10/7/09 16:22	HJG3	SM3111-B
Selenium	mg/kg	1.5	10/7/09 16:22	HJG3	EPA 200.9
Silver	mg/kg	<0.50	10/7/09 16:22	HJG3	EPA 200.9
Zinc	mg/kg	514	10/7/09 16:22	HJG3	SM3111-B
Nutrient - As Received					
Ammonia as N (As Received)	%	0.0075	10/6/09 11:31	EHK	SM4500-NH3-G
Nitrate+Nitrite as N (As Received)	%	<0.0001	10/2/09 10:18	EHK	SM4500-NO3-H
Organic Nitrogen as N (As Received)	%	0.9645	10/7/09 12:16	SB	Calc
Total Kjeldahl Nitrogen (As Received)	%	0.962	10/2/09 11:48	EHK	SM4500-Norg-C
Total Nitrogen as N (As Received)	%	0.9621	10/6/09 9:20	EHK	Calc
Total Phosphorus as P (As Received)	%	0.511	10/2/09 13:53	EHK	SM4500-P-F(w/Dig)
Nutrient-Dry Weight					
Ammonia as N (Dry Weight-Sludge)	%	0.053	10/6/09 11:31	EHK	SM4500-NH3-G
Nitrate+Nitrite as N (Dry Weight - Sludge)	%	<0.0005	10/2/09 10:18	EHK	SM4500-NO3-H
Organic Nitrogen as N (Dry Weight - Sludg	%	6.84	10/7/09 12:16	SB	Calc
Total Kjeldahl Nitrogen (Dry Weight-Sludge	%	6.82	10/2/09 11:48	EHK	SM4500-Norg-C
Total Nitrogen as N (Dry Weight - Sludge)	%	6.82	10/6/09 9:20	EHK	Calc
Total Phosphorus as P (Dry Weight-Sludge	%	3.62	10/2/09 13:53	EHK	SM4500-P-F(w/Dig)
Physical					
% Solids	%	14.1	9/30/09 17:03	RON	SM2540-G
pH	SU	6.96	10/2/09 9:52	CC	SM4500-H+/B

ND = Not Detected
* = Above Specified Limit
** = Above Client Limit

Shelly Bloom

ENVIROCORP • LABS
51 CLARK ST • HARRINGTON, DE 19952
SINCE 1984
ANALYTICAL SERVICES

Client Name:	Allen Foods Harbeson
Contact:	Michael Sause
Address:	P.O. Box 63
	Harbeson, DE 19951
Phone	
Cell	
Fax	
email	

Payment Rec. *Cash*_____ *Check #*_____ *Invoice*__X__

Email Reports O *Fax Reports* O

Containers Received: (circle)
Type: Q M N/P Bacti
Quant:
Temperature Upon Receipt ____ °C

Administrators Notes

Lab I.D	Sample Description/Location	Sample Date	Time	Matrix	$TRCl_2$	$FACl_2$	% S, pH, TN, ON	TKN, NO3O2, NH3, TP	K, Cd, Pb, Hg, Zn, Ag, Ni, Se, Mo, Cu					
					Chlorine		Please check appropriate box for each test requested							
77304	Sludge Grab	9/30	9:15	D/W			X	X	X					
				D/W										
				D/W										
				D/W										
				D/W										
				D/W										
				D/W										
				D/W										

Q=Quart (Unpreserved), M=Metals (HNO_3), N/P=Nutrients (H_2SO_4), Bacti=P/A Colilert® (Sodium Thiosulfate)

Sampled by: Client Date 9/30 /Time 915

Reliniquished by: Ron D Date 9-30-09 /Time 1505

Reliniquished by:_____ Date_____ /Time_____

Received by Ron D Date 9-30-09 /Time 0930

Received by J. Welty Date 9/30/09 /Time 1505

Received by_____ Date_____ /Time_____

Allen Family Foods, Inc.

Allen Family Foods, Inc.

Phone:
FAX:
email:

June 12,, 2009

Mr. Allen McCloskey
Department of Natural Resources & Environmental Control
Division of Water Resources
89 Kings Highway
Dover, Delaware 19901

RE: Section 4.04 Report

Dear Mr. McCloskey:

Please find enclosed an updated Section 4.04 report with a staffing plan based on Jeffrey Bailey's completion of certification renewal requirements. In that plan I have designated my shift operators as having Direct Responsible Charge (DRC) for their respective shifts and laboratory.

If you should have any questions, please let me know.

Respectfully submitted,
ALLEN FAMILY FOODS, INC.

Michael R. Sause
Wastewater Manager

Attachments

HARBESON WASTEWATER PLANT STAFFING

Name	Title	Certification Level
Michael Sausé	Wastewater Manager (DRC Entire Plant)	DE Level 4
Thomas Paine	Wastewater Operator / Assistant Supervisor (DRC Entire Plant)	DE Level 3 (OIT)
Jeffrey Bailey	Wastewater Operator / Line Leader 3rd shift (DRC)	DE Level 2
Nancy Kraus	Wastewater Operator / Laboratory (DRC) 3rd shift	DE Level 1
Robert Salensky	Operator-in-Training 1st shift	Not Certified*

*Has passed the Level 1 wastewater certification exam, however, is waiting to take the GED exam required for Level 1 certification.

Christopher Brinson	Wastewater Operator / 2nd Shift (DRC)	DE Level 1
Tom Brinson	Allen's Corporate Support	DE Level 4

Areas of Responsibility

As Wastewater Manager Michael Sausé currently has Direct Responsible Charge (DRC) and overall management responsibility of the Harbeson Wastewater Treatment Facility. Tom Brinson provides technical support and DE Level 4 coverage when necessary.

The operators cover three shifts to oversee the operations and maintenance of the Harbeson wastewater facility to ensure permit compliance with discharge requirements. DRC status should be considered as noted above due to the level of responsibility on the shifts that each operator is responsible for. Processes include dissolved air flotation thickener, anoxic lagoons, complete mixed activated sludge, final clarification, chlorination, dechlorination, sludge digestion and belt filter press. Duties include, but are not limited to, operation of equipment, operation checks, process control checks, minor preventive and corrective maintenance, process laboratory testing, housekeeping, etc .

STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES &
ENVIRONMENTAL CONTROL
DIVISION OF WATER RESOURCES
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

Surface Water Discharges Section

Phone: (302) 739-9731
Fax: (302) 739-7954

SECTION 4.04 REPORT

NAME OF WASTEWATER TREATMENT FACILITY: Allen's Wastewater Treatment Facility

ADDRESS OF WASTEWATER TREATMENT FACILITY: 18752 Harbeson Road P.O. Box 63
Harbeson, DE 19951

NAME OF OWNER: Allen Family Foods, Inc.

ADDRESS OF OWNER: 126 N. Shipley Street
Seaford, DE 199[illegible]73

TYPE OF PLANT OR TYPE OF UNIT PROCESSES OPERATED: Anoxic Ponds, Complete Mix Activated Sludge
Clarification, Chlorination Dechlorination
Digesters, UV, Belt Filter Press

PLANT SIZE: DESIGN FLOW: 1.25 MGD
AVERAGE DAILY FLOW: 1.10 MGD May, 2009

OPERATORS IN DIRECT RESPONSIBLE CHARGE:	NAME	AREAS OF PLANT RESPONSIBILITY
	Michael R. Sauvé	ORC Entire Plant

OTHER OPERATORS	NAME	AREAS OF PLANT RESPONSIBILITY
	see attached sheet	

6-12-09
Date

Michael R. Sauvé
Responsible Official

Delaware's good nature depends on you!

STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES AND
ENVIRONMENTAL CONTROL
DIVISION OF WATER RESOURCES
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

ENVIRONMENTAL LABORATORY
SECTION

PHONE: (302) 739-9942
FAX: (302) 739-3491

October 27, 2009

J. Chris Cleaver
DWR - Surface Water Discharge Section - NPDES
89 Kings Highway
Dover, DE 19901

Attention: J. Chris Cleaver

Attached you will find the following Laboratory Results:

Order Number:	0910025
Project Description:	Allen Family Foods
Date Received:	10/14/2009
Time Received:	13:40

If you have any questions regarding this data, please contact me at the above telephone number.

Sincerely,

Kathy A. Knowles
Laboratory Manager

Delaware's good nature depends on you!

Environmental Laboratory Section - Division of Water Resources Delaware
Department of Natural Resources and Environmental Control 89 Kings Highway,
Dover, DE 19901 Phone: 302-739-9942

ANALYSIS REPORT

ELS Sample Number:	0910025-001	*Matrix:*	Waste Water
Client Sample Description:	001	*Sampling Method:*	Grab
Site ID:	001	*Date and Time Collected:*	10/14/2009 10:30

Test Parameter	*Method*	*Result*	*Units*	*Qualifier*	*LOQ*	*Analysis Date*
Aggregate Organic Constituents						
N-Hexane Extractable Material	EPA 1664	< 5.3	mg/L		5.3	10/19/2009
Microbiological Examination						
Enterococcus	USEPA 1600	1	cfu/100ml		1	10/15/2009

Environmental Laboratory Section - Division of Water Resources Delaware
Department of Natural Resources and Environmental Control 89 Kings Highway,
Dover, DE 19901 Phone: 302-739-9942

Qualifier Codes, Definitions, and Abbreviations

Qualifier/Flag

<	Sample value is below the method detection limit. The result is reported as < MDL.
>	Sample value is above the upper quantitation limit. The upper quantitation limit is reported.
AB	Air Bubble in DO bottle
B	Compound not detected substantially (10 times) above the level reported in the laboratory blanks (For Chlorophyll & Pheophytin, blank value is at or below amount detected in sample).
BT	Secchi disk ON BOTTOM. The reported result is the depth from the surface to the bottom.
C	See report narrative or comment line for observations concerning this result.
C V	Analysis performed after holding time expired.
D	Sample diluted for analysis.
EG	Value exceeds a theoretically equivalent or greater value (e.g. dissolved > total).
EW	Value exceeds a theoretically equal or greater value (e.g. dissolved > total). However, the difference is within the expected precision of the analytical techniques and is not statistically significant.
FB	The parameter was detected in the field blank at a concentration that was both above the MDL and greater than 10% of the sample concentration.
FZ	Samples frozen prior to analysis
I	The reported value is estimated due to the presence of interference.
IM	Instrument malfunctioned; No measurement taken.
J	Analyte present; reported value is estimated; concentration is below the range for accurate quantitation (greater than the MDL, but less than the LOQ).
J V	Analysis performed after holding time expired.
JH	Result is likely overestimated due to matrix effect.
JL	Result is likely underestimated due to matrix effect.
LOQ	Limit of Quantitation
MDL	Method Detection Limit
NA	Not Analyzed but required by project workplan or analytical request form.
NBF	No bottom measurement recorded in the field due to shallow water; Bottom records are those measurements recorded at surface.
NC	Sample not collected, but required by the project work plan.
ND	Not Detected.
NE	Field measurement not taken due to uncontrollable field sampling event or Natural Condition (Depth of water too deep/shallow).
NF	Sample collected, but not analyzed by the laboratory due to field error.
NO	None Observed
NR	No Result. See report narrative or comments for explanation.
NV#	Analytical result not valid.
O	Sample outsourced for analysis. Data will be reported separately.
P	Sample not properly preserved in field in accordance with preservation requirements. Data may be suspect.
QC	Quality control value is outside acceptance limits.
QNS	Quantity not sufficient. Not enough sample to perform requested analyses.
S	Results will be reported in a separate report; See attached report.
SD	Sample discarded; Sample collected but not analyzed as per client request.
SNF	Site has no flow (i.e. a dry stream or a stream with no velocity)
STD	Stream too deep
STS	Site is too shallow to sample
U	Compound was analyzed but not detected. The method detection limit is reported.
UR	Nothing unusual was noted during the analysis of this sample. However, the test result differs from the norm to an extent that the laboratory considers it unreliable.
USGS	USGS Gauge
V	Analysis performed after holding time expired.
X	Results were not available at the time of the release of the report. Results will be reported when available.

Environmental Laboratory Section - Division of Water Resources Delaware
Department of Natural Resources and Environmental Control 89 Kings Highway,
Dover, DE 19901 Phone: 302-739-9942

Qualifier Codes, Definitions, and Abbreviations

Units

CFS	Cubic Feet per Second.
cfu/100mL	Colony forming units per 100 mL.
G	gram; there are 1000 g in 1 Kg.
GPM	Gallons per minute.
IN	Inches.
Kg	Kilogram.
L	Liter.
mg	milligram; there are 1000 mg in 1 g.
MGD	Millions of Gallons per Day.
ml	milliliter; there are 1000 ml in 1 L.
mpn/100mL	most probable number per 100 mL.
NTU	Nephelometric Turbidity Units. NTU is numerically equivalent to Formazin turbidity unit (FTU).
oC	Celsius.
pCi/L	Pico curie per liter.
ppb	Parts per billion=ug/Kg, ug/L.
ppm	Parts per million=mg/Kg, ug/g, mg/L, ug/ml; 1 ppm=1000 ppb.
su	Standard Units.
ug	microgram; there are 1000 ug in 1 mg.
uL	microliter; there are 1000 ul in 1 ml.
uMhos	Conductivity units for laboratory measurements.
uS	micro siemens; units used to measure conductivity in the field; same as uMhos.

Environmental Laboratory Section - Division of Water Resources
Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 (302) 739-9942

FIELD CHAIN OF CUSTODY

(Complete in BLUE ink)

Client : J. Chris Cleaver
Address : 89 Kings Highway
Dover, DE 19901
Phone No.: (302)739-9946

Report To : J. Chris Cleaver
Invoice To : J. Chris Cleaver
Account : NPDES
ELS Order ID : 0910025

PROJECT NAME: Allen Family Foods
SAMPLERS (Please Print): J. Chris Cleaver

(ELS Use Only) Lab Log No.	Client Sample Description	Sample Date	Sample Time	Matrix*	Comp	Grab	No. Of Containers	ANALYSES: Oil & Grease; ENTPCO	REMARKS
0910025-001	001	10-14	1035	WW		/	4	3 /	

RELINQUISHED BY: (signature)	DATE	TIME	RECEIVED BY: (signature)
C. Cleaver	10.14.09	1340	Renee L Heinen

DW - drinking water
ER - equip. rinsate
GW - ground water
Lab - lab water
LW - liquid waste
SE - sediment
SL - sludge
SO - soil
SW - surface water
TI - tissue
WS - solid waste
WW - waste water

COMMENTS:
42 0.0
pH 7.3

Is laboratory chain-of-custody required?
Yes / No

ELS USE ONLY
Sample Conditions (circle response):
1. Samples match COC? Yes/No 2. Bottles supplied by ELS? Yes/No 3. Samples received broken leaking? Yes/No 4. Cooler temp bottle 2-6 degrees? Yes/No/NA
5. Properly preserved? Yes/No 6. VOA/DO containers free of headspace? Yes/No/NA 7. Holding times expired? Yes/No 8. Volume sufficient for analysis? Yes/No

Cos 040101

STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES AND
ENVIRONMENTAL CONTROL
DIVISION OF WATER RESOURCES
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

ENVIRONMENTAL LABORATORY
SECTION

PHONE: (302) 739-9942
FAX: (302) 739-3491

October 27, 2009

J. Chris Cleaver
DWR - Surface Water Discharge Section - NPDES
89 Kings Highway
Dover, DE 19901

Attention: J. Chris Cleaver

Attached you will find the following Laboratory Results:

Order Number:	0910027
Project Description:	Allen Family Foods
Date Received:	10/15/2009
Time Received:	13:40

If you have any questions regarding this data, please contact me at the above telephone number.

Sincerely,

Kathy A. Knowles
Laboratory Manager

Delaware's good nature depends on you!

Environmental Laboratory Section - Division of Water Resources Delaware
Department of Natural Resources and Environmental Control 89 Kings Highway,
Dover, DE 19901 Phone: 302-739-9942

ANALYSIS REPORT

ELS Sample Number:	0910027-001	***Matrix:***	Waste Water
Client Sample Description:	001C	***Sampling Method:***	Composite
Site ID:	001C	***Date and Time Collected:***	10/15/2009

Test Parameter	*Method*	*Result*	*Units*	*Qualifier*	*LOQ*	*Analysis Date*
Inorganic Nonmetallic Constituents						
Ammonia as N, Total	USEPA 350.1	0.343	mg/L		0.020	10/16/2009
Nitrogen, Total, Alkaline Persulfate	APHA 4500-P-J	23.7	mg/L		0.500	10/20/2009
Phosphorus, Total, Alkaline Persulfate	APHA 4500-P-J	0.292	mg/L		0.010	10/20/2009
Organic Aggregate Constituents						
BOD, 5-Day (Seeded)	APHA 5210-B	< 2.40	mg/L		2.40	10/16/2009
Physical and Aggregate Properties						
Residue, Nonfilterable (TSS)	APHA 2540-D	3	mg/L		2	10/22/2009

ANALYSIS REPORT

ELS Sample Number:	0910027-002	***Matrix:***	Waste Water
Client Sample Description:	001	***Sampling Method:***	Grab
Site ID:	001	***Date and Time Collected:***	10/15/2009 10:50

Test Parameter	*Method*	*Result*	*Units*	*Qualifier*	*LOQ*	*Analysis Date*
Aggregate Organic Constituents						
N-Hexane Extractable Material	EPA 1664	< 5.2	mg/L		5.2	10/19/2009
Inorganic Nonmetallic Constituents						
Ammonia as N, Total	USEPA 350.1	2.06	mg/L		0.100	10/16/2009
Nitrogen, Total, Alkaline Persulfate	APHA 4500-P-J	24.0	mg/L		0.500	10/20/2009
Phosphorus, Total, Alkaline Persulfate	APHA 4500-P-J	0.725	mg/L		0.010	10/20/2009
Microbiological Examination						
Enterococcus	USEPA 1600	> 600	cfu/100ml		10	10/16/2009
Organic Aggregate Constituents						
BOD, 5-Day (Seeded)	APHA 5210-B	8.15	mg/L		2.40	10/16/2009
Physical and Aggregate Properties						
Residue, Nonfilterable (TSS)	APHA 2540-D	15	mg/L		2	10/22/2009

Environmental Laboratory Section - Division of Water Resources Delaware
Department of Natural Resources and Environmental Control 89 Kings Highway,
Dover, DE 19901 Phone: 302-739-9942

Qualifier Codes, Definitions, and Abbreviations

Qualifier/Flag

<	Sample value is below the method detection limit. The result is reported as < MDL.
>	Sample value is above the upper quantitation limit. The upper quantitation limit is reported.
AB	Air Bubble in DO bottle
B	Compound not detected substantially (10 times) above the level reported in the laboratory blanks (For Chlorophyll & Pheophytin, blank value is at or below amount detected in sample).
BT	Secchi disk ON BOTTOM. The reported result is the depth from the surface to the bottom.
C	See report narrative or comment line for observations concerning this result.
C V	Analysis performed after holding time expired.
D	Sample diluted for analysis.
EG	Value exceeds a theoretically equivalent or greater value (e.g. dissolved > total).
EW	Value exceeds a theoretically equal or greater value (e.g. dissolved > total). However, the difference is within the expected precision of the analytical techniques and is not statistically significant.
FB	The parameter was detected in the field blank at a concentration that was both above the MDL and greater than 10% of the sample concentration.
FZ	Samples frozen prior to analysis
I	The reported value is estimated due to the presence of interference.
IM	Instrument malfunctioned; No measurement taken.
J	Analyte present; reported value is estimated; concentration is below the range for accurate quantitation (greater than the MDL, but less than the LOQ).
J V	Analysis performed after holding time expired.
JH	Result is likely overestimated due to matrix effect.
JL	Result is likely underestimated due to matrix effect.
LOQ	Limit of Quantitation
MDL	Method Detection Limit
NA	Not Analyzed but required by project workplan or analytical request form.
NBF	No bottom measurement recorded in the field due to shallow water; Bottom records are those measurements recorded at surface.
NC	Sample not collected, but required by the project work plan.
ND	Not Detected.
NE	Field measurement not taken due to uncontrollable field sampling event or Natural Condition (Depth of water too deep/shallow).
NF	Sample collected, but not analyzed by the laboratory due to field error.
NO	None Observed
NR	No Result. See report narrative or comments for explanation.
NV#	Analytical result not valid.
O	Sample outsourced for analysis. Data will be reported separately.
P	Sample not properly preserved in field in accordance with preservation requirements. Data may be suspect.
QC	Quality control value is outside acceptance limits.
QNS	Quantity not sufficient. Not enough sample to perform requested analyses.
S	Results will be reported in a separate report; See attached report.
SD	Sample discarded; Sample collected but not analyzed as per client request.
SNF	Site has no flow (i.e. a dry stream or a stream with no velocity)
STD	Stream too deep
STS	Site is too shallow to sample
U	Compound was analyzed but not detected. The method detection limit is reported.
UR	Nothing unusual was noted during the analysis of this sample. However, the test result differs from the norm to an extent that the laboratory considers it unreliable.
USGS	USGS Gauge
V	Analysis performed after holding time expired.
X	Results were not available at the time of the release of the report. Results will be reported when available.

Environmental Laboratory Section - Division of Water Resources Delaware
Department of Natural Resources and Environmental Control 89 Kings Highway,
Dover, DE 19901 Phone: 302-739-9942

Qualifier Codes, Definitions, and Abbreviations

Units

CFS	Cubic Feet per Second.
cfu/100mL	Colony forming units per 100 mL.
G	gram; there are 1000 g in 1 Kg.
GPM	Gallons per minute.
IN	Inches.
Kg	Kilogram.
L	Liter.
mg	milligram; there are 1000 mg in 1 g.
MGD	Millions of Gallons per Day.
ml	milliliter; there are 1000 ml in 1 L.
mpn/100mL	most probable number per 100 mL.
NTU	Nephelometric Turbidity Units. NTU is numerically equivalent to Formazin turbidity unit (FTU).
oC	Celsius.
pCi/L	Pico curie per liter.
ppb	Parts per billion=ug/Kg, ug/L.
ppm	Parts per million=mg/Kg, ug/g, mg/L, ug/ml; 1 ppm=1000 ppb.
su	Standard Units.
ug	microgram; there are 1000 ug in 1 mg.
uL	microliter; there are 1000 ul in 1 ml.
uMhos	Conductivity units for laboratory measurements.
uS	micro siemens; units used to measure conductivity in the field; same as uMhos.

Environmental Laboratory Section - Division of Water Resources
Department of Natural Resources and Environmental Control
89 Kings Highway, Dover, DE 19901 (302) 739-9942

FIELD CHAIN OF CUSTODY

(Complete in BLUE ink)

Client : J. Chris Cleaver
Address : 89 Kings Highway
Dover, DE 19901
Phone No.: (302)739-9946

Report To : J. Chris Cleaver
Invoice To : J. Chris Cleaver
Account : NPDES
ELS Order ID : 0910027

PROJECT NAME: Allen F.F.

SAMPLERS (Please Print): J. Chris Cleaver

(ELS Use Only) Lab Log No.	Client Sample Description	Sample Date	Sample Time	Matrix*	Comp	Grab	No. Of Containers	ANALYSES: BOD Test	TKN, NH3	Nitrate	Phos				REMARKS
0910027-001	001	10-15	2HR	WW	/		1	/	/	/					
0910027-002	001	10-15	1050	WW		/	3	/	/	/	/	/			

RELINQUISHED BY: *(signature)* C. Cleaver — DATE: 10-15-09 — TIME: 1340

RECEIVED BY: *(signature)* Bruce A. Henman

DW - drinking water; ER - equip. rinsate; GW - ground water; Lab - lab water; LW - liquid waste; SE - sediment; SL - sludge; SO - soil; SW - surface water; TI - tissue; WS - solid waste; WW - waste water

COMMENTS:
BOD C/2

Is laboratory chain-of-custody required? Yes / No

ELS USE ONLY
Sample Conditions (circle response):
1. Samples match COC? Yes No 2. Bottles supplied by ELS? Yes No 3. Samples received broken/leaking? Yes No 4. Cooler temp bottle 2-6 degrees? Yes No NA
5. Properly preserved? Yes No 6. VOA/DO containers free of headspace? Yes No NA 7. Holding times expired? Yes No 8. Volume sufficient for analysis? Yes No

Coc 040101

Queen F.F. (CSE) 10-14-09

Arrived @ 08:50, met with Tom Brinson (Co Environmental Mgr.) and Mike Sauzé (DR Mgr.)

* Checked Comparit Sampler upon arrival There was "No" ice in the Sampler and the temp. of the effluent sampl was over 10°c ! informed the Facility Mgr. that the sample was no good, and to Re-start the sample for tomorrow... (with ice)

* Checked Pre-treatment room, very clean, DAF running good !
The Belt Filter Press was down due to low Sludge inventory !

* Checked Ponds A & B = All aerator and mixers are in service. All Blowers in service.

Allen F.F. (CSI - cont) 10-14-09

* Checked cmss tanks x @ = Working good, all Blowers in service.

* Checked clarifier = Very clear, rake drive visible!

* Cl2 Contact chamber = Looks good. Facility Re-using 200K of effluent per day for Off-all and Truck wash downs.

* Effluent Parshall Flume = New Sigma sampler, new tubing! (No ice in sampler? Flow meter Cal. 8-11-09.

* Checked Outfalls 001 = Plant eff. very clear and clean.
002 = S/W - Back fence line, clean, identified, working good.

Allen F.F. (CSI cont.) 10-14-09

Checked Outfalls : 003 & 004 = Bath storm water, very clean.

* Checked O & M manual = Good, Revised yearly.

* Checked SPCC Plan = Was revised by B.P. Environmental on 2-6-09, and reviewed and signed by Mgt.

* Found that Sampler Val. calibrations are "NOT" being done monthly !

* DMR parameters done in-house are = Flow, Ph and Cl2 !

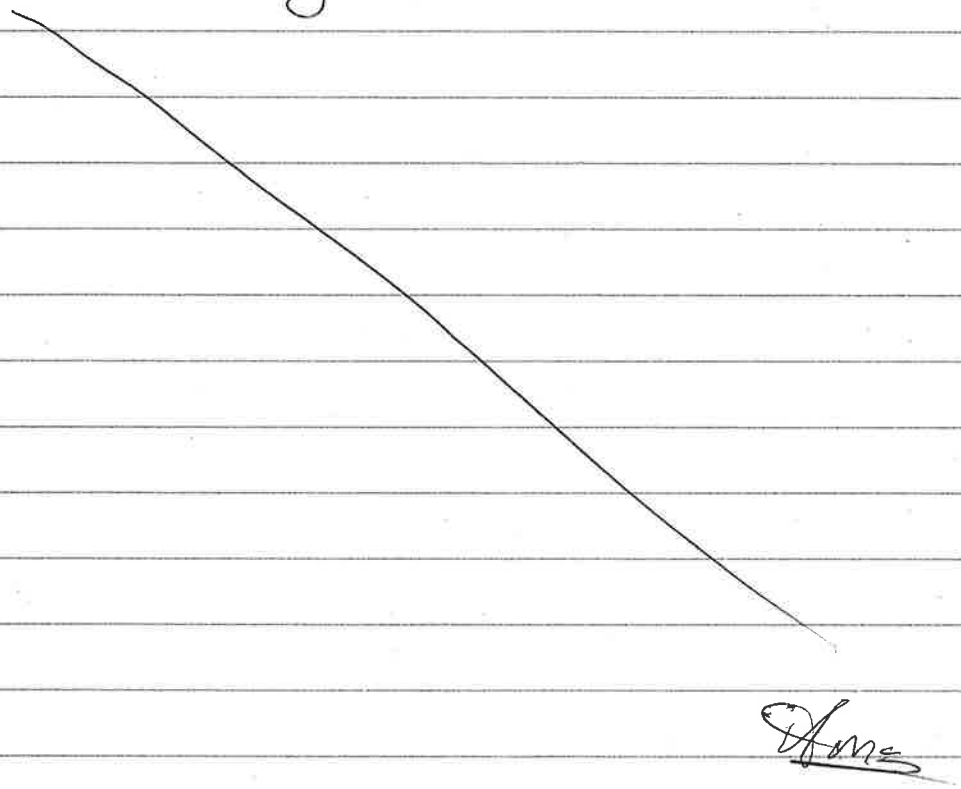
Buffers = ④ 9-10 exp-date ⑦ 4-10 exp.da ⑩ 9-10 exp. date.

* The Hach Chlarometer was very dirty as well as the glass ware used.

Allen F.F. (CSI cont.) 10-14-09

* Went over Aug-2009 DMR : (27) days of discharge. No problems!

Left facility @ 12:10



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES &
ENVIRONMENTAL CONTROL
DIVISION OF WATER RESOURCES
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

Surface Water Discharges Section

Phone: 302-739-9946
Fax: 302-739-8369

Certified Mail # 70063450000338482962
Return Receipt Requested

October 15, 2009

Allen's Family Foods, Inc.
Mr. Mike Sause' – Wastewater Manager
P.O. Box 63
Harbeson, DE 19951

Re: Compliance Sampling & Inspection Sampling (CSI) – October 14, 2009
NPDES Permit No. DE-0000299

Dear Mr. Sause':

On behalf of the State of Delaware, Surface Water Discharges Section, Compliance Branch, I would first like to thank you, Mr. Tom Paine, and your associates for the cooperation and assistance given to our Senior Environmental Compliance Specialist, Mr. Allen McCloskey, during the Compliance Sampling & Inspection (CSI) completed at your facility on October 14, 2009.

With one exception (see below), laboratory records, reagents, instrumentation, and methods were reviewed for conformance to NPDES requirements, and were found to be in accordance with these requirements. Overall WWTP operation, plant housekeeping, and solids handling were very good and your operators were very cooperative, very helpful, and very knowledgeable. Mr. McCloskey reported that there was significant improvement in the blacktop area outside of the "Off-all" building, and was much improved from the last inspection. A Discharge Monitoring Report "Spot Check" (August 2009) showed that all data was consistent with reported laboratory data, and all methods used for generating the data were within NPDES requirements.

During this CSI, there was one (1) observable major deficiency noted:

- During the facility inspection, it was observed that the composite sample container was sitting in a small amount of water, but there was no observable ice to cool the composite sample. As this was a Compliance Sampling Inspection, Mr. McCloskey was to obtain a "split" from your composite sample that was initiated the previous day. 40 CFR Part 136 requires that all

> samples taken for NPDES monitoring purposes must be preserved according to Table II "Required Containers, Preservation Techniques, and Holding Times". Table II is very specific in that your samples, at minimum, must be cooled to ≤6 degrees Celsius during compositing and while holding the sample. A temperature check of your composited sample showed a temperature in excess of 10 degrees Celsius . . . the sample was therefore declared null and void and was not accepted by Mr. McCloskey. Mr. McCloskey then instructed the facility to reinitiate the composite sampling for pickup the next day. Preservation Techniques as directed in 40 CFR Part 136, Table II, must be followed for all sampling events related to NPDES sample monitoring . . . at minimum, a composite sample container must be iced or refrigerated so that the sample contained therein is maintained at a temperature ≤6 degrees Celsius.

There were also two (2) minor deficiencies noted as follows:

- It was also observed that the composite sampler aliquot volumes are not being verified and documented on a regular basis. It is the responsibility of the permittee to ensure that compositing is completed in an accurate manner and that proper sample volumes are verified and documented. During previous CSI's, it was strongly recommended that sampler aliquot volumes be verified and documented on a monthly basis to ensure accuracy. A printout was given to Mr. McCloskey that had no signatures or initials, no specific sample volumes, and no average value shown. The documentation for sample volume must show 4 – 6 individual sample volumes checked, the average of the sample volumes, the date, the operator, and must show that all samples taken were within 10% of the average volume.
- While observing the testing of an effluent sample for Total Residual Chlorine, it was observed that the small glass test tube used to hold the sample for evaluation was very dirty. Since the Hach Meter used for this DPD method is based on light scatter, it is imperative that the glass test tube be clean and free of dirt, film, or scratches.

As a result of the improper sampling technique used for collecting the composite sample for October 14, 2009, Allen's Family Foods was directed to restart the composite sampler for split sampling the next day (October 15, 2009). Grab samples were taken on October 14, 2009. On October 15, 2009, Mr. Chris Cleaver of our section arrived at Allen's Family Foods to pick up the composite sample split for Outfall 001. The temperature of the composite was well within the required temperature and the sample looked relatively clear. Upon observing the effluent at the Outfall 001, Mr. Cleaver observed that the effluent was very cloudy and did not look normal. As a result of this observation, Mr. Cleaver did obtain grab samples of the Outfall 001 discharge, and had it tested for Enterococcus; the result of the Enterococcus test showed a value of >600 cfu/100ml. Although your NPDES Permit does not have a Daily Maximum requirement, using a value of >600 in any Geometric Mean calculation would result in a value reported as "Greater Than" (>), and would statistically result in a possible exceedance of your Daily Average allowable of 33.0 col/100ml. In a letter from Mr. Tom Brinson, dated October 16, 2009, it was indicated that the cause of this upset was a result of a storm water holding tank that was overflowing into the effluent coming from the final clarifier, and that the problem was corrected at approximately 11:30 AM on the morning of October 15, 2009. How does Allen's Foods plan to keep this similar problem from happening in the future?

The Surface Water Discharges Section is attempting to gain voluntary compliance in accordance with 7 Del.C. § 6019. Please send your formal written response, including any corrective/preventative actions to the above noted deficiencies, by no later than 30 days after receiving this letter. The formal written response must be mailed to my attention at Delaware-DNREC, Division of Water Resources, Surface Water Discharges Section, 89 Kings Highway, Dover, DE 19901.

On behalf of the State of Delaware, Surface Water Discharges Section, Compliance Branch, I would again like to thank you, Tom Paine, and everyone at the Allen's Family Foods, Harbeson, Delaware Plant, for the cooperation and participation in this Compliance Sampling Inspection program to help assure the continued quality of NPDES effluent waters and the self-reporting data. If you have any questions, please contact Mr. Allen McCloskey or me at 302-739-9946.

Sincerely,

Glenn F. Davis
Program Manager
Surface Water Discharges Section
State of Delaware – DNREC

ecopy: Mr. Allen McCloskey – DNREC